

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

JOHN A. ABRAHAM, M.D.,

Plaintiff,

v.

THOMAS JEFFERSON UNIVERSITY,
et al.

Defendants.

CIVIL ACTION NO.: 20-cv-02967 (MMB)

DEFENDANTS' MOTION TO DISMISS COMPLAINT

For the reasons stated in the accompanying memorandum of law, which is incorporated herein by reference, Defendants hereby move to dismiss the complaint in its entirety pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

Respectfully submitted,

KLEHR HARRISON HARVEY
BRANZBURG LLP

Dated: August 21, 2020

/s/ Stephanie D. Wolbransky
William A. Harvey (No. 25344)
Lisa A. Lori (No. 83814)
Stephanie D. Wolbransky (No. 326356)
1835 Market Street, Suite 1400
Philadelphia, PA 19103
Telephone: (215) 569-2700
Fax: (215) 568-6603
wharvey@klehr.com
llori@klehr.com
swolbransky@klehr.com
Attorneys for Defendants